

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

MICHAEL J. GRESS and BRANDY L. GRESS, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

FREEDOM MORTGAGE CORPORATION,

Defendant.

Case No. 1:19-cv-00375-JEJ
(Hon. John E. Jones III)

**[PROPOSED] STIPULATION AND ORDER SETTING BRIEFING
SCHEDULES FOR DISPOSITIVE MOTIONS AND PLAINTIFFS’
MOTION FOR CLASS CERTIFICATION**

Plaintiffs Michael J. Gress and Brandy L. Gress (“Plaintiffs”) and defendant Freedom Mortgage Corporation (“Defendant”), through the undersigned counsel, hereby stipulate and agree as follows:

WHEREAS by Order dated May 31, 2019, the Court set a case schedule that specifically required dispositive motions to be filed by February 3, 2020 [Dkt. No. 30 at 1]; and

WHEREAS the parties had agreed that motions for class certification should be due by the same date as dispositive motions and, therefore, at that time, agreed that motions for class certifications should be due by February 3, 2020; and

WHEREAS the parties were directed by Chambers to submit a joint

stipulation to extend the time by which a class certification motion may be filed;
and

WHEREAS said stipulation was filed on June 3, 2019 [Dkt. No. 32]; and

WHEREAS, by subsequent Order dated October 17, 2019, the Court
extended the entire case schedule by approximately three months and specifically
required that dispositive motions be filed by May 8, 2020 [Dkt. No. 52]; and

WHEREAS the parties agree that motions for class certification should be
due by the same date as dispositive motions and, therefore, agree that motions for
class certification should be due by May 8, 2020; and

WHEREAS the parties wish to set briefing schedules for Plaintiffs'
anticipated motion for class certification and any dispositive motions that may be
filed;

IT IS HEREBY STIPULATED AND AGREED that the time by which
Plaintiffs may file a motion for class certification is hereby extended to **May 8,**
2020; and

IT IS FURTHER STIPULATED AND AGREED by the parties that good
cause exists to continue the briefing schedule on Plaintiffs' motion for class
certification and any dispositive motions that may be filed as follows:

- May 8, 2020 — Date by which motions shall be filed;
- June 5, 2020 — Date by which opposition papers shall be filed; and

- June 19, 2020 — Date by which reply papers shall be filed.

IT IS SO ORDERED.

Dated this ____ day of January 2020.

s/ John E. Jones III
Hon. John E. Jones III, U.S.D.J.

By: /s/ Bradley F. Silverman

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CERTIFICATE OF SERVICE

I certify that, on January 22, 2020, I caused a copy of this Joint Stipulation Extending Time By Which Plaintiffs May File A Motion For Class Certification to be served on all parties and counsel of record via the Court's CM/ECF system.

/s/ *Bradley F. Silverman*